

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

K.A.P.A. MANAGEMENT INC. d/b/a
DALLAS DODGE CHRYSLER JEEP,

Plaintiff,

v.

FCA US LLC,

Defendant.

Civil Action File No.: 4:14-cv-00226

DEFENDANT’S SUPPLEMENTAL INITIAL DISCLOSURES

PLEASE TAKE NOTICE that, defendant FCA US LLC (“FCA”), hereby provides the supplemental disclosure required by Fed. R. Civ. P. 26(a), and the rules of this Court.

(5) Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information.

In addition to the individuals identified in FCA’s initial disclosures, filed on October 2, 2014, FCA identifies the following individuals as likely to have discoverable information:

1. **Craig Bowers** – Mr. Bowers is FCA’s Marketing Manager for the SEBC. He previously held the position of Sales Operations Manager for the SEBC. He has general knowledge about the Dallas dealership operations and interactions with FCA, including without limitation, its failure to meet its MSR and provide adequate management personnel to assist the dealership in attaining its MSR, and FCA’s efforts to assist Dallas in meeting its MSR. He has also communicated with Mr. Gill and other employees at the Dallas dealership regarding Dallas’ inadequate sales performance. He is located at the SEBC at 10300 Boggy Creek Road, Orlando, Florida and can be reached through FCA’s outside counsel, Robert D. Cultice, at 617-526-6021.
2. **V. Andrew Gill** – Mr. Gill is the owner and President of Dallas Dodge. He has knowledge of all issues raised in the complaint including, without limitation, Dallas’ failure to meet its obligations regarding MSR and management personnel.
3. **Andrew Gill** – Mr. Gill has held a number of positions at Dallas Dodge including Vice President and General Sales Manager. He has knowledge about Dallas’ operations and interactions with FCA, including without limitation, Dallas’ failure to meet its obligations regarding MSR and management personnel. He also has knowledge regarding allocation, inventory, and Dallas’ financials.
4. **Robert Peppers** – Mr. Peppers has held a number of positions at Dallas Dodge including General Sales Manager. He has knowledge about Dallas’ operations and interactions with FCA, including without limitation, Dallas’ failure to meet its obligations regarding MSR and management personnel. He also has knowledge regarding allocation.
5. **Jason Allmon** – Mr. Allmon has held a number of positions at Dallas Dodge including Vice President, Comptroller, CFO, and Operations Manager. He has knowledge about Dallas’ operations and interactions with FCA, including without limitation, Dallas’ failure to meet its obligations regarding MSR and management personnel. He

also has knowledge regarding Dallas' financials and FCA's incentive programs.

6. **Jeff Sachs** – Mr. Sachs was Dallas' Director of Sales Operations. He has knowledge about Dallas' operations and interactions with FCA, including without limitation, Dallas' failure to meet its obligations regarding MSR and management personnel.
7. **Carl Mushrush** – Mr. Mushrush was Dallas' General Manager, Managing Senior Partner, and co-owner. He has knowledge about Dallas' operations and interactions with FCA, including without limitation, Dallas' failure to meet its obligations regarding MSR and management personnel. He also has knowledge regarding allocation, inventory, and Dallas' financials.
8. **Jason Graham** – Mr. Graham was Dallas' Finance Manager. He has knowledge about Dallas' operations and interactions with FCA, including without limitation, Dallas' failure to meet its obligations regarding MSR and management personnel. He also has knowledge regarding FCA incentives and may have knowledge regarding the allegations Dallas has made about the Voyles dealership.

Dated: May 26, 2015

FCA US LLC
By Its Attorneys,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 26, 2015, I electronically filed the foregoing DEFENDANT'S SUPPLEMENTAL INITIAL DISCLOSURES using the Court's CM/ECF system which will automatically generate a Notice of Electronic Filing to all counsel of record.

/s/ Patricia R. Britton

Patricia R. Britton, Esq.